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11/29/01
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOAN D. TESCHÉ, :
 : Civil Action No. 1:CV-01-0326
Plaintiff :
v. :
 :
CNA INSURANCE COMPANIES, and :
CONTINENTAL CASUALTY COMPANY, :
 :
Defendants : (Judge Caldwell)

JOINT MOTION TO EXTEND CERTAIN
PRE-TRIAL DEADLINES

FILED
HARRISBURG
NOV 28 2001
MARY E. D'ANDREA, CLERK
Per. [Signature] DEPUTY CLERK

1. By order dated July 3, 2001, the Honorable William W. Caldwell established certain pre-trial deadlines including: discovery (December 3, 2001); plaintiff's and defendants' expert reports (December 3, 2001 and January 3, 2002, respectively); and pre-trial motions (December 3, 2001). Attached as Exhibit "A" is a copy of Judge Caldwell's July 3, 2001 order.

2. The parties' undersigned counsel jointly request a modest extension of the stated deadlines in that:

(a) this case will be decided on the pleadings, certain stipulated facts, deposition transcripts, and cross motions for summary judgment;

(b) for approximately seven weeks, plaintiff's counsel has been attempting to schedule the deposition of CNA's representative, Cheryl Sauerhoff, and such deposition was recently scheduled for December 3, 2001;

(c) the parties are in the process of exploring serious settlement negotiations which would obviate the need for additional litigation and the resultant attorneys' fees and costs;

(d) if the case is not promptly settled, the parties need a modest extension of time to complete discovery and to file cross motions for summary judgment; and

(e) the requested extension would increase the chances of either a successful settlement or a prompt disposition by summary judgment.

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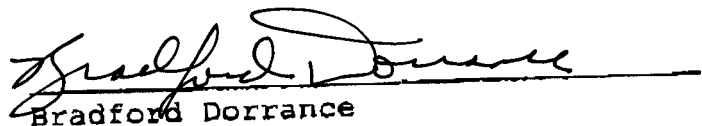
KEEFER WOOD ALLEN & RAHAL, LLP → 215587169

WHEREFORE, the parties' respective counsel respectfully request that the Court enter the order accompanying this motion and grant such other relief as it may deem appropriate.

Respectfully submitted,

KEEFER WOOD ALLEN & RAHAL, LLP

Dated: 11/28/01



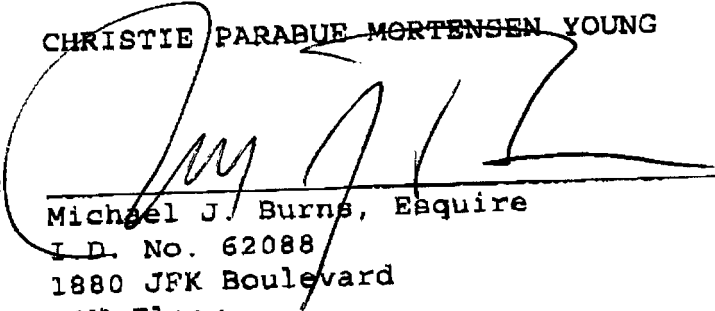
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Date: 11/27/01

By:



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(Attorneys for Defendant)

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOAN D. TESCHE,

Plaintiff

vs.

CNA INSURANCE COMPANIES, and
CONTINENTAL CASUALTY COMPANY,
Defendants

CIVIL ACTION NO. 1:CV-01-0326

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O R D E R

MARY E. D'ANDREA, CLERK
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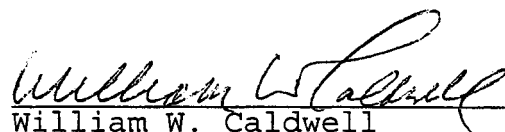
AND NOW, this 3rd day of July, 2001, in connection
with the case management conference in this matter IT IS ORDERED
THAT:

- ✓ a) Discovery shall be completed by December 3, 2001. The parties shall identify any expert witnesses and shall provide reports promptly. Plaintiff's report is due by December 3, 2001, and defendant's report is due by January 3, 2002. Supplementations, if any, are due by January 22, 2002. ✓ (This case is on the standard track).
- ✓ b) Motions for joinder of parties shall be filed by August 1, 2001. Motions to amend pleadings shall be filed by August 1, 2001. ✓
- ✓ c) All pre-trial motions shall be filed by December 3, 2001, accompanied by a supporting brief. All briefs filed in this case shall comply with Local Rule 7.8 and paragraph IV of the scheduling order previously entered in this case.
- ✓ d) This case shall be placed on the April, 2002 trial list of this court, scheduling order to follow. Parties and known witnesses

Exhibit "A"

shall be notified of this schedule
immediately, or as soon as identified as such.

Litigants should be aware that it is my policy to adhere to the
schedule hereby established. Continuances of trial and extensions
of the discovery period will be granted only when extraordinary
circumstances arise and application is timely made.


William W. Caldwell
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the person(s) and in the manner indicated below:

First-Class Mail, Postage Prepaid
Addressed as Follows:

Michael J. Burns, Esquire
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(Attorneys for Defendants)

Dated: 11/28/01


Bradford Dorrance